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We received your letter on the Rio Grande National Forest Final Environmental Impact Statement for the Land Management Plan (FEIS) dated May 19, 2020. Because of when the comments were received, we were unable to include your comments and corrections in the final version of the documents.

Our responses are included below. This letter will be included in the Project Record to note the comments and corrections to the FEIS. For ease and clarity in our response comments from the letter are numbered to correspond with responses below. The specific comments included in the May 19 letter included:

1. *Page 31. First full paragraph – Please more clearly state the level of interest in deferred parcels.*
2. *Page 32, Seventh Paragraph – It should be more clearly stated that USFS has reviewed all their oil and gas stipulations and has found them to be satisfactory. Exhibit 1 of the USFS/BLM MOU 2006-07 Memorandum of Understanding (MOU) Between United States Department of the Interior and the United States Department of Agriculture Forest Service Concerning Oil and Gas Leasing and Operations Forest Service Agreement No. 06-SU-L L 132428-052 could be used to clarify: “USFS is responsible for developing lease stipulations for National Forest lands that are only as restrictive as necessary to protect the resources for which they are applied.”*
3. *Pages 70-76 - The Air Resources section makes at least six references to a supporting document (Assessment 2 – Air Quality, Soils, and Water Resources (USDA Forest Service 2016)). The direct link to the Air Quality, Soils, and Water Resources (USDA Forest Service 2016) report is [https://www.fs.usda.gov/Internet/FSE\\_DOCUMENTS/fseprd480526.pdf](https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/fseprd480526.pdf). There is also a link presented on page Volume 1 page 452 as (<https://www.fs.usda.gov/project/?project=46078>). Please incorporate the appropriate link in each section.*
4. *Pages 78-79 - The Cumulative Effects sub-section describes that: “Upwind sources of pollutants are expected to continue at similar levels. Impacts from the energy extraction and production industry and from large cities upwind of the National Forest will likely affect air quality.” and that “Monitoring and modeling efforts would continue to integrate knowledge and understanding of local and regional inputs to air quality*



*standards.” The BLM Colorado has completed two studies of Regional air quality modeling as part of its Colorado Air Resource Management Modeling Study (CARMMS) and has developed several annual reports. The most recent version of CARMMS (2.0) modeled future year 2025 cumulative air pollutant concentrations and related values impacts at Class I and sensitive Class II areas in and around the Forest. The CARMMS 2.0 also modeled impact contributions from various groups of emissions sources including San Juan Basin and BLM Tres Rios Field Office Federal oil and gas. We encourage that the USFS continue to review BLM Colorado’s modeling studies as well as its Annual Report that informs how air quality (and related values) are being impacted. The link to BLM CARMMS and Annual Report is:*

*<https://www.blm.gov/programs/natural-resources/soil-air-water/air/colorado>.*

5. *Page 166, Section: Affected Environment, Existing Conditions, and Trends, paragraph 2: Delete sentences 5-7, starting with “Lease sales proposed... ..” and replace with: “Parcels of land where the BLM has closed out older EOI’s or parcels in deferred status can be re-nominated for lease at any time. Any lands leased under an older, unrevised plan would be managed under the pre-existing stipulations and decisions of that plan.”*
6. *Pages 154, 158, 184, 382 – Please clarify the different roles the BLM and USFS have regarding fee structures and the livestock industry that should be clarified. Generally, there are basic differences on how billing is conducted for USFS and BLM. A description might be helpful to describe the differences between Head Months and Animal Unit Month (AUMs) and make sure that this difference is noted in different sections of the document. The USFS bases permits on a Head Month unit, not the AUM units used by BLM. While the USFS permit uses Head Month units, the USFS bills on AUM because it uses BLM’s AUMs fee structure.*

Responses and input to the above comments can be found below.

1. Under the “Overview of Alternative A” the FEIS states that *“The only known leasable minerals are oil and gas. When the 1996 forest plan was signed there were no producing wells on the Forest but there were 23 active leases. All of those leases have since expired. Lease sales proposed in 2008 and 2009 for parcels near South Fork and Del Norte remain deferred as of July 2017.”* This makes it clear that all leases are currently defect and there has been limited interest in leases since 2009.
2. Under the heading “Features Common to All Alternatives” which leads into the description of the action alternatives it states, *“Forest leasable minerals include oil and gas. The Forest is not proposing to amend or expand the direction for leasable minerals in any of the alternatives. All stipulations from the 1996 forest plan are incorporated into the current direction.”* All stipulations were reviewed before determining to carry them forward into forest plan revision. The stipulations were updated to be consistent with the final plan decision and are included as Forest Plan Appendix J.
3. Live links included in the reference cited section are for the correct documents. Assessment 2 – Air Quality, Soil and Water Resources can be found at [https://www.fs.usda.gov/Internet/FSE\\_DOCUMENTS/fseprd480526.pdf](https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/fseprd480526.pdf). This specific document is referenced in the Air Quality section. The other link referenced, <https://www.fs.usda.gov/project/?project=46078>) links to the web location for *all* of the assessments referenced in the analysis. Very few live links are included in the body of the document.
4. The CARMMS study will be referenced on relevant project analysis.

5. Both statements are correct and will be included. Parcels in deferred status can be re-nominated for lease at any time. Lands leased under previous plans will be managed under the pre-existing stipulations and decision of that plan.
6. The letter is correct in asserting that the BLM and Forest Service have different roles regarding fee structures. The FEIS considers management of National Forest System lands. The difference in fee structures and the livestock industry between the BLM and the US Forest Service are not relevant in this context.

Thank you again for the comments submitted. This letter is added to the project record for the FEIS to record any changes made. I look forward to continuing to work together to implement our forest plan into the future.

Sincerely,



DAN DALLAS  
Forest Supervisor

cc: Judi Perez, Patrick Moran, Jason Dungan, Roger Sayre (RSayre@blm.gov)